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April 10, 2025

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VIA CM ECF

Hon. John K. Sherwood, U.S.B.J.
United States Bankruptcy Court
District of New Jersey
50 Walnut Street, 3rd Floor, Courtroom 3D
Newark, NJ 07102

Re: In re: Granite Asset Group, LLC, Debtor;
Case No.: 24-18209-JKS (Chapter 11)

Dear Judge Sherwood:

The undersigned represents secured creditor Trinity Life Insurance Company ("TLIC"). Please accept this letter on behalf of TLIC as a response and partial objection to the pending application by Norgaard, O'Boyle & Hannon (the "Norgaard Firm") to withdraw as Debtor's counsel in the above-referenced proceeding (ECF Doc. 75).

While TLIC takes no position with respect to the Norgaard Firm's request to withdraw as Debtor's counsel based upon the contents of its Certification to the Court, TLIC objects to the Norgaard Firm's failure within its application to provide TLIC and the Court with the Norgaard's Firm's proposed disposition of the sum of \$2,405.29 currently on deposit in its IOLTA, which serves as security for the Debtor's timely remittance of monthly adequate protection payments pursuant to this Court's November 20, 2024 Order (ECF Doc. 36), as extended by this Court's March 31, 2025 Order (ECF Doc. 74).

Prior to interposing the within objection, counsel for TLIC and the Debtor conducted a telephonic meet and confer to discuss the manner by which the foregoing funds would remain in escrow as security for future adequate protection payments due to TLIC. Annexed hereto as Exhibit "A" is an e-mail from the undersigned to John O'Boyle, Esq. of the Norgaard Firm which memorializes the manner by which TLIC has agreed to address the maintenance of the funds currently held in escrow by the Norgaard Firm.

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By reason of the foregoing, in the event the Court grants the Norgaard Firm's pending application to withdraw Debtor's counsel, TLIC respectfully requests that the Court's Order include the provisions set forth within Exhibit "A" with respect to disposition of the foregoing escrow funds.

We thank the Court for its consideration.

Respectfully submitted,

/s/ Jeffrey J. Rea

JEFFREY J. REA

JJR/bjg

encl.

cc: John O'Boyle, Esq. (via ECF and first class mail; w/encl)
Francis J. Ballak, Esq. (via ECF and first class mail; w/encl)
Peter J. Auria, Esq. (via ECF and first class mail; w/encl)
John P. Di Iorio, Esq. (via ECF and first class mail; w/encl)
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